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Magistrate Judge Mary Alice Theiler

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

IN THE MATTER OF
THE EXTRADITION OF
JASON STEADMAN.

MJ-15-562
Misc. No

COMPLAINT FOR PROVISIONAL ARREST
WITH A VIEW TOWARDS EXTRADITION
(18 U.S.C. § 3184)

I, the undersigned Assistant United States Attorney, being duly sworn, state on
information and belief that the following is true and correct:

1. There is an Extradition Treaty, as amended by Protocols, in force between
the United States and Canada (the "Treaty"). Treaty on Extradition Between the United
States of America and Canada, U.S.-Can., Dec. 3, 1971, 27 U.S.T. 983, T.I.A.S. 8237;
Protocol Amending the Extradition Treaty with Canada, U.S.-Can., Jan. 11, 1988, S.
TREATY DOC. NO. 101-17 (1990); Second Protocol Amending Extradition Treaty with
Canada, U.S.-Can., Jan. 12, 2001, S. TREATY DOC. NO. 107-11 (2002).

COMPLAINT FOR PROVISIONAL ARREST WARRANT- 1
STEADMAN USAO 2015V01354

UNITED STATES ATTORNEY
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SEATTLE, WASHINGTON 98101
(206) 553-7970

1 2. The Treaty provides in Article 11 for the provisional arrest and detention of
2 alleged fugitives pending the submission of a formal request and supporting documents.

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4 3. In accordance with Article 11 of the Treaty, the Government of Canada has
5 asked the United States for the provisional arrest of JASON STEADMAN, with a view
6 toward extradition.

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8 4. According to information provided by Canada in the form authorized by the
9 Treaty, STEADMAN, an American citizen, is wanted in Canada to stand trial on the
10 following charges: (1) first degree murder, in violation of section 235(1) of the Criminal
11 Code of Canada (CCC); and (2) arson, damaging the property of others, in violation of
12 section 434 of the CCC, all committed within the Province of Alberta in Canada on or
13 about May 31, 2015. STEADMAN has been charged in an Information in the District of
14 Edmonton in the Province of Alberta, and a warrant for his arrest was issued on October
15 7, 2015, by Justice of the Peace Magistrate Stewart N. Douglas, in the Judicial District of
16 Edmonton, and is still in force.

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19 5. The warrant was issued on the basis of the following facts:

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21 6. Dwayne Demkiw was employed as a truck driver, traveling between
22 Edmonton and Calgary during the week. He also worked part-time as a limousine driver
23 for Revolution Entertainment, located at 14918-128 Avenue in Edmonton.

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25 7. During the evening of May 30, 2015, Demkiw attended a birthday party for
26 a friend at The Oil Lamp restaurant in downtown Edmonton. He left the party at
27 approximately 9:00 p.m. to begin his part-time limousine job for the evening. This job
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1 was to last from approximately 9:30 p.m. on May 30, until 3:00 a.m. on May 31.

2 Demkiw made arrangements with friends at the party to contact the friends when he was
3 done with his limousine job, as they expected to still be socializing and he planned to
4 rejoin them.
5

6 8. Driver logs and interior surveillance video from Revolution Entertainment
7 show that Demkiw returned to Revolution Entertainment shortly after 3:00 a.m. on May
8 31. Demkiw left the shop alone, via the rear door, at approximately 4:00 a.m. on May 31,
9 2015. At 4:30 a.m., another Revolution Entertainment employee arrived at Revolution
10 Entertainment to unload his DJ equipment. The employee noticed that Demkiw's car was
11 not parked at the location, the business was secure, and all was in order.
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14 9. At 10:50 a.m. on May 31, the Calgary Fire Department responded to a
15 parking lot in Southeast Calgary for a report of a car fire. At that location, they found a
16 1992 Black Acura with the engine running, no license plate attached, and a fire burning
17 in the trunk area. Prior to the arrival of the Fire Department, a witness observed the
18 burning car and a male leaving the parking lot, while looking back at the burning car.
19 The witness observed that the male had a license plate in his hand at the time. The
20 witness took a video of the male. The video captured the male, who was wearing khaki
21 cargo shorts, a white t-shirt and sandals, as he was leaving the parking lot. The police
22 have determined that this male was not Demkiw. The fire was extinguished, and
23 members of the Calgary Police Service (CPS) later determined that the burned vehicle
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1 was owned by Dwayne Demkiw. A still photo from the video taken of the male leaving
2 the parking lot is included in the provisional arrest request from Canada.

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4 10. A video canvass of the area of the burning car was conducted by the CPS
5 and this canvass revealed that one block from the parking lot, at the C-Train station (the
6 C-Train is Calgary's commuter rail system), a male wearing khaki cargo shorts, a white t-
7 shirt, and sandals entered the station approximately five minutes after Demkiw's car was
8 discovered on fire. Prior to this male entering the train station, he was captured on video
9 discarding an object similar in size to a license plate in a garbage container at the
10 entrance. A still video photo of the male outside the station and entering the station is
11 included in the request from Canada.
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14 11. After discovering the burning car, attempts by the police to contact
15 Demkiw through his car registration information were unsuccessful. Demkiw's
16 roommate, Brian Ballendine, and Demkiw's former common-law wife, Angel Chalifoux,
17 were contacted by the police and informed about Demkiw's burning car. Ballendine and
18 Chalifoux informed the police that Demkiw was not at home as he was expected to be.
19 Further, the investigation revealed that Demkiw did not contact the friends from the
20 previous evening's birthday party to meet up with them after he finished work, as
21 planned. Nor had he posted photos or posts from the previous evening on social media,
22 which was very unusual according to Demkiw's friends.
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25 12. During the afternoon on May 31, 2015, another friend of Demkiw's went to
26 Revolution Entertainment and discovered a machete sheath (without a corresponding
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1 knife) and a "North Face" cap, lying together in a raised planter at the rear of the
2 building, next to the rear door where Demkiw would have exited Revolution
3 Entertainment and in the vicinity of where his car would have been parked while at work.
4 The friend turned the cap and sheath over to the police that same day. DNA analyses
5 were later performed on the cap. As described below, the analyses established that
6 STEADMAN is the contributor of the DNA on the cap.
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9 13. Ballendine then went to the trucking company where Demkiw was, by this
10 time, supposed to be at work, and learned that Demkiw had not shown up for his shift.
11 This was very out of character, according to Demkiw's employer.
12

13 14. Chalifoux conducted a "Find My iPhone" check for Demkiw's phone and
14 determined that its last known location was at 184 St/Henday at 5:30 a.m. on May 31,
15 2015. During a subsequent police search of that location on June 7, 2015, which is the
16 Anthony Henday Freeway, the police discovered the phone on a bridge over a ravine.
17 While the phone appeared to have been intentionally damaged, the police were able to
18 determine from the SIM card that it was Demkiw's phone. The Anthony Henday
19 Freeway is the most direct vehicle route between Revolution Entertainment and the main
20 highway between Edmonton (the location of Revolution Entertainment) and Calgary (the
21 scene of the car fire). Calgary is approximately 174 miles south of Edmonton.
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23 15. Chalifoux was later shown a still video photo of the male from the C-Train
24 station and she stated that it appeared to be a photo of her recent ex-boyfriend, whom she
25 knew as Robert Aubrey-Maxwell. Canadian authorities attached a copy of this still video
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1 photo to the request. Chalifoux informed the police that Aubrey-Maxwell did not like the
2 fact that she had remained friends over the years with her ex-common-law husband,
3 Demkiw. According to Chalifoux, Aubrey-Maxwell blamed Demkiw for the fact that
4 Chalifoux and Aubrey-Maxwell's relationship did not evolve. According to Chalifoux,
5 Aubrey-Maxwell knew that Demkiw owned the Acura and knew that Demkiw worked at
6 Revolution Entertainment, as Aubrey-Maxwell had accompanied Chalifoux to
7 Revolution Entertainment to pick up Demkiw on one occasion.
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10 16. A forensic examination of Demkiw's burned vehicle revealed that there
11 were significant blood stains in the driver's seat and on the driver's door, as well as
12 throughout the backseat area. DNA testing later confirmed that all of this blood belonged
13 to Dwayne Demkiw. Since May 31, 2015, Demkiw has not been seen or heard from; he
14 has not shown up for either of his jobs; he has not made any posts on social media—
15 despite the fact that he had a habit of being active on social media; he has not returned
16 home; he has not contacted any of his friends; he has not contacted any family members;
17 and he has not accessed any of his bank accounts or used any of his credit/debit cards.
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21 17. Numerous attempts to locate and interview Chalifoux's ex-boyfriend
22 Aubrey-Maxwell were unsuccessful. Information regarding Aubrey-Maxwell and his
23 vehicle, a white 2014 GMC Sierra truck, was placed in a police database and, on June 14,
24 2015, the truck was located abandoned in Vancouver. During a forensic examination of
25 the truck, a chewed piece of gum was located in the box of the truck. DNA analyses
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1 were performed on the gum. As described later, the analyses established that
2 STEADMAN is the contributor of the DNA in the gum.
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4 18. When Canadian police investigated Aubrey-Maxwell, they located records
5 indicating that he had been born on February 20, 1989 and raised in Ontario. He was
6 incarcerated in Ontario and ultimately had his DNA taken and put into the "Known
7 Offender Data Bank." Aubrey-Maxwell travelled from Ontario in the summer of 2012,
8 surfacing in Vancouver on June 12, 2012. He last spoke to his grandmother, Judy
9 Bateman, by phone call on September 6, 2012, at which time he advised Bateman that he
10 was still in Vancouver. This call is the last known contact any family or police agencies
11 are known to have had with Aubrey-Maxwell from Ontario.
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14 19. The investigation into the true Aubrey-Maxwell's background further
15 revealed that on September 12, 2012, a male with two pieces of non-photo identification
16 in the name of Robert Aubrey Maxwell went to an ICBC (a Canadian government agency
17 that issues driver's licenses, I.D. cards, and motor vehicle insurance) office in Vancouver
18 and obtained a photo identification in the name of Robert Aubrey-Maxwell, with a date
19 of birth of February 20, 1989, in Vancouver. As described below, the police
20 investigation has revealed that the male who obtained this new photo identification, is not
21 the Robert Aubrey-Maxwell from Ontario, but, rather, is STEADMAN.
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25 20. Thereafter, STEADMAN, now using the name Robert Aubrey-Maxwell,
26 travelled to Alberta and on November 24, 2012 obtained an Alberta driver's license and a
27 Canadian Passport. This is the man that Chalifoux knows as Robert Aubrey-Maxwell.
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1 (The investigation later revealed that STEADMAN, while purporting to be Robert
2 Aubrey-Maxwell, showed Chalifoux the Alberta driver's license and he had Chalifoux
3 keep his passport for him).
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5 21. The photo from the Alberta driver's license in the name of Robert Aubrey-
6 Maxwell was sent to the Washington State Motor Vehicles Division and was run through
7 its "Facial Comparison" computer program. That process selected a series of photos of a
8 male identified in its system as Jason STEADMAN, with a date of birth in August , 1974.
9 A copy of the series of photos selected is attached to the Canadian request for provisional
10 arrest. The police investigation revealed that STEADMAN had legally changed his name
11 in Washington State from Stephen/Rory PRESTON, with the same date of birth in
12 August, 1974, to Jason STEADMAN. Both names—Jason STEADMAN and
13 Stephen/Rory PRESTON—carry the same U.S. Social Security Number, specifically:
14 XXX-XX-2057.
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18 22. A DNA analysis of the "North Face" cap, which was seized along with the
19 empty machete sheath from the rear of Revolution Entertainment in Edmonton, and the
20 chewed gum, which was seized from the box of the truck registered to Robert Aubrey-
21 Maxwell that was located abandoned in Vancouver, revealed that the DNA profiles for
22 both match, that is, the contributor of the DNA on the cap and in the gum is the same
23 male. The police investigation further revealed that the contributor of the DNA on the
24 cap and in the gum is not the true Robert Aubrey-Maxwell. The DNA samples taken
25 from the cap and the gum were then sent to the United States to be run through the DNA
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1 Data Bank of U.S. authorities. At the conclusion of this process, the male contributor of
2 the DNA on the cap and in the gum was identified in the DNA Data Bank as belonging to
3
4 Stephen/Rory PRESTON, alias Jason STEADMAN, both names bearing a DOB of
5 August XX, 1974, and both associated with U.S. Social Security Number XXX-XX-
6 2057.

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8 23. Judy Bateman, Robert Aubrey-Maxwell's grandmother in Ontario was
9 shown the Alberta drivers' license photo of the male purporting to be Aubrey-Maxwell,
10 and Bateman stated that she has never seen that person before and has no idea who it
11 could be.
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13 24. Based on the evidence gathered during the police investigation, authorities
14 in Canada have concluded that STEADMAN, while living in Alberta as Robert Aubrey-
15 Maxwell, met and dated Dwayne Demkiw's ex-girlfriend Angel Chalifoux, which caused
16 friction between STEADMAN and Demkiw because Chalifoux remained friends with
17 Demkiw while dating STEADMAN. The evidence further indicates that on May 31,
18 2015, STEADMAN accosted Demkiw at the rear of Revolution Entertainment,
19
20 inadvertently leaving behind the "North Face" cap which contained his DNA, and the
21 sheath. It is here that STEADMAN is believed to have overpowered Demkiw and caused
22 injury sufficient to cause Demkiw's death. STEADMAN then disposed of Demkiw's
23 body, which has never been recovered, and drove Demkiw's car to Calgary--disposing of
24 Demkiw's iPhone along the way--and thereafter setting Demkiw's car on fire in the
25
26 Calgary parking lot, in an attempt to destroy forensic evidence.
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1 25. According to Canadian authorities, prior to his recent incarceration in
2 Washington State, STEADMAN, alias PRESTON, was last known to be in Washington
3 State at a probation appointment on July 25, 2012. He failed to attend his next scheduled
4 probation appointment on the August 3, 2012.
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6 26. STEADMAN is described as a male, with blue eyes and light brown hair.
7 He was born on August XX, 1974, and is a U.S. citizen. Canada has provided a copy of a
8 photograph of STEADMAN.
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10 27. The offenses with which Jason STEADMAN is charged are provided for in
11 Article 2 of the Extradition Treaty, as amended by the Protocols, cited above.
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13 28. STEADMAN may be found within the jurisdiction of this court at FDC
14 SEATAC, 2425 South 200th Street, Seattle, Washington 98198.
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16 29. Canada has represented that it will submit a formal request for extradition,
17 supported by the documents specified in the Treaty, within 60 days, as required by
18 Article 11 of the Extradition Treaty, as amended by the Protocols.
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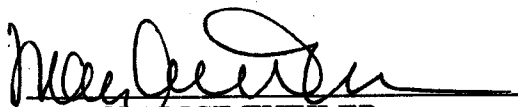
20 30. Sometime after STEADMAN's provisional arrest, the magistrate will
21 schedule a date for the formal hearing required under 18 U.S.C. § 3184. Because the
22 foreign government has not yet made a formal extradition request by providing
23 supporting documentation required under Article 9 of the Treaty, the hearing should not
24 be scheduled at this time.
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1 WHEREFORE, the undersigned complainant requests that a warrant for the arrest
2 of the person names above be issued in accordance with 18 U.S.C. § 3184 and the
3 Extradition Treaty, as amended by the Protocols
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5 

6 SUSAN M. ROE
7 Assistant United States Attorney

8
9 Sworn to before me and subscribed in my presence this 8th day of
10 December 2015, at Seattle, Washington

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13 MARY ALICE THEILER
14 United States Magistrate Judge
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